

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

**EAGLE AUTO MALL CORP., TERRY
CHRYSLER JEEP, INC., JHS BUSINESS
ASSOCIATES INC. D/B/A CROSSROADS
SUPERSTORE, and WESTMINSTER
DODGE, INC.,**

Plaintiffs,

v.

CHRYSLER GROUP LLC,

Defendant.

Case No: 2:10-cv-3876(LDW)(ETB)

Notice of Motion

TO: Leonard A. Bellavia
Bellavia Gentile & Associates, LLP
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516-873-3000
Fax: 516-873-9302
Email: lbellavia@dealerlaw.com

PLEASE TAKE NOTICE that upon the annexed declaration of Robert D. Cultice in support of this motion and the Certificate of Good Standing annexed thereto we will move this Court before the Honorable Leonard D. Wexler at the United States Courthouse for the Eastern District of New York, pursuant to Rule 1.3 (c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an Order allowing the admission of Robert D. Cultice, a member of the firm of Wilmer Cutler Pickering Hale and Dorr LLP and a member in good standing of the Bar of the Commonwealth of Massachusetts, as attorney pro hac vice to argue or try this case in whole or in part as counsel. There are no pending disciplinary proceedings against me in any State or Federal court.

Respectfully submitted,

s/ Robert D. Cultice

Robert D. Cultice
Wilmer Cutler Pickering Hale and Dorr LLP
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Boston, Massachusetts 02109
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Attorney for Defendant Chrysler Group LLC

Dated: September 29, 2010

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EASTERN DISTRICT OF NEW YORK

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Declaration of Robert D. Cultice in
Support of Motion to Admit
Counsel Pro Hac Vice

I, Robert D. Cultice, declare under penalty of perjury as follows:

1. I am a partner with the law firm of Wilmer Cutler Pickering Hale and Dorr LLP.
2. I submit this declaration in support of my motion for admission to practice pro hac vice in the above captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto I am a member in good standing of the Bar of Massachusetts.
4. There are no pending disciplinary proceedings against me in any State or Federal court.
5. Wherefore your declarant respectfully submits that he be permitted to appear as counsel and advocate pro hac vice in this one case.

s/ Robert D. Cultice
Robert D. Cultice

Dated: September 29, 2010

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

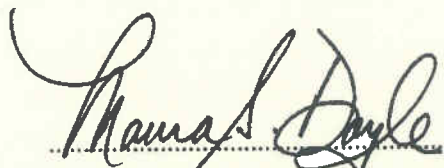
BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on the **fifteenth** day of **December** A.D. **1978**, said Court being the highest Court of Record in said Commonwealth:

Robert D. Cultice

being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court*.

In testimony whereof, I have hereunto set my hand and affixed the seal of said Court, this **seventeenth** day of **September** in the year of our Lord **two thousand and ten**.




MAURA S. DOYLE, Clerk

* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.

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ADMISSION TO PRACTICE PRO
HAC VICE

The motion for admission to practice pro hac vice in the above captioned matter is granted. The admitted attorney Robert Cultice is permitted to argue or try this particular case in whole or in part as counsel or advocate.

An attorney admitted to practice pro hac vice is required to pay a \$25.00 attorney admission fee and present this Order to the intake deputy clerk in the Clerk's Office. When paying by mail, return a copy of this Order to the Clerk's Office with the required fee.

This Order confirms your appearance as counsel in this case, and it will be entered on the Court's docket. A notation of your admission pro hac vice for the above listed case will be made on the roll of attorneys.

Dated:

Leonard D. Wexler, USDJ